

Joseph D. Jean, Esq.  
Scott D. Greenspan, Esq.  
**PILLSBURY WINTHROP SHAW PITTMAN LLP**  
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New York, NY 10019  
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*Special Insurance Counsel to the Debtor and Debtor  
in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MADISON SQUARE BOYS & GIRLS CLUB, INC.,<sup>1</sup>  
Debtor.

Chapter 11

Case No. 22-10910 (SHL)

**FIRST MONTHLY FEE STATEMENT OF  
PILLSBURY WINTHROP SHAW PITTMAN LLP  
FOR COMPENSATION FOR SERVICES RENDERED  
AND REIMBURSEMENT OF EXPENSES INCURRED AS  
SPECIAL INSURANCE COUNSEL FOR DEBTOR FOR PERIOD  
FROM JUNE 29, 2022 THROUGH JULY 31, 2022**

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<sup>1</sup> The last four digits of the Debtor's federal tax identification number are 6792. The Debtor's mailing address is 250 Bradhurst Avenue, New York, New York 10039.

Name of Applicant:	Pillsbury Winthrop Shaw Pittman LLP
Authorized to Provide Professional Services to:	Debtor and Debtor in Possession
Date of Retention:	August 12, 2022, <i>nunc pro tunc</i> June 29, 2022
Period for which compensation and reimbursement is sought:	June 29, 2022 through July 31, 2022
Monthly Fees Incurred:	\$136,796.18
20% Holdback:	\$27,359.24
Total Compensation Less 20% Holdback:	\$109,436.94
Monthly Expenses Incurred:	\$4,583.43
Total Fees and Expenses Due:	\$114,020.37
This is a: <u>X</u> monthly ____ interim ____ final application	

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”), the *Order Authorizing the Retention and Employment of Pillsbury Winthrop Shaw Pittman LLP as Special Insurance Counsel for Debtors and Debtors in Possession Nunc Pro Tunc to the Petition Date* [Docket No. 123] (the “Retention Order”), and the *Order Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals* [Docket No. 125] (the “Interim Compensation Order”),<sup>2</sup> Pillsbury Winthrop Shaw Pittman LLP (“Pillsbury”), special insurance counsel for the above-captioned debtor and debtor in possession (collectively, the “Debtor”)

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<sup>2</sup> Capitalized terms used herein but not otherwise defined herein have the meanings ascribed to them in the Interim Compensation Order.

hereby submits this first monthly fee statement (the “First Monthly Fee Statement”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Debtor, for the period from June 29, 2022 through July 31, 2022 (the “First Monthly Fee Period”). By this First Monthly Fee Statement, Pillsbury seeks payment in the amount of \$114,020.37, which is comprised of (i) \$109,436.94, which represents eighty percent (80%) of the total amount of compensation sought for actual and necessary services rendered during the First Monthly Fee Period, and (ii) reimbursement of \$4,583.43, which represents one hundred percent (100%) of actual and necessary expenses incurred in connection with such services, subject in each case to certain voluntary reductions.

**Services Rendered and Expenses Incurred**

1. Attached as Exhibit A is a summary of Pillsbury’s professionals by individual, setting forth the (i) name, title, and department of each individual who provided services in connection with this chapter 11 case during the First Monthly Fee Period, (ii) aggregate hours spent by each individual, (iii) hourly billing rate for each such individual at Pillsbury’s current billing rates, (iv) amount of fees earned by each Pillsbury professional, and (v) the year of bar admission for each attorney. The blended hourly billing rate of Pillsbury attorneys during the First Monthly Fee Period is approximately \$1,257.75. The blended hourly rate of legal assistants during the First Monthly Fee Period is approximately \$382.50.
2. Attached as Exhibit B is a summary of the services rendered and compensation sought, by project category, for the First Monthly Fee Period.
3. Attached as Exhibit C is a summary of expenses incurred and reimbursement sought, by expense type, for the First Monthly Fee Period.
4. Attached as Exhibit D is itemized time detail of Pillsbury professionals for the First Monthly Fee Period and summary materials related thereto.

**Notice and Objection Procedures**

5. Notice of this First Monthly Fee Statement shall be given by hand or overnight delivery or email where available upon (a) the Debtor, Madison Square Boys and Girls Club, Inc., 250 Bradhurst Avenue, New York, New York 10039 (Attn.: Tim McChristian, Jeffrey Dold); (b) Debtor's counsel, Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019 (Attn.: Alan W. Kornberg, Andrew M. Parlen, John T. Weber); (c) counsel to the United States Trustee for Region 2, U.S. Department of Justice, Office of the U.S. Trustee, 201 Varick Street, Room 1006, New York, New York 10014 (Attn.: Andrea B. Schwartz and Tara Tiantian); and (d) counsel to the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, New York 10017 (Attn.: James Stang, John W. Lucas and Gillian N. Brown).

6. Objections to this First Monthly Fee Statement, if any, must be filed with the Court and served upon Paul, Weiss and the other Notice Parties so as to be received no later than **fifteen (15) days after filing of Fee Statement** (the "Objection Deadline"), setting forth the nature of the objection and the amount of fees or expenses at issue (an "Objection").

7. If no objections to this First Monthly Fee Statement are filed and served as set forth above, the Debtor shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses identified herein.

8. If an objection to this First Monthly Fee Statement is received on or before the Objection Deadline, the Debtor shall withhold payment of that portion of this First Monthly Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such an objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

New York, New York  
Dated: September 2, 2022

/s/ Joseph D. Jean  
Joseph D. Jean, Esq.  
Scott D. Greenspan, Esq.  
**PILLSBURY WINTHROP SHAW PITTMAN,  
LLP**  
31 West 52nd Street  
New York, NY 10019  
Telephone: (212) 858-1000  
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joseph.jean@pillsburylaw.com  
scott.greenspan@pillsburylaw.com

*Special Insurance Counsel to the Debtor and Debtor in  
Possession*

**Exhibit A**

**Compensation by Professional**

**SUMMARY OF COMPENSATION BY PROFESSIONAL  
FOR SERVICES RENDERED FOR THE PERIOD  
FROM JUNE 29, 2022 THROUGH JULY 31, 2022**

Name of Professional Partners and Counsel	Title	Department	Year Admitted	Standard Hourly Rate (\$)	10% Discounted Hourly Rate (\$)	Total Billed Hours	Total Compensation (\$)
Joseph D. Jean	Partner	Litigation	2000	\$1,570.00	\$1,413.00	10.6	\$14,977.80
Barbara L. Croutch	Senior Counsel	Litigation	1990	\$1,225.00	\$1,102.50	89.1	\$98,232.75
<b>Total Partners and Counsel:</b>						#99.7	<b>\$113210.55</b>

Name of Paralegals and Other Non-Legal Staff	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Total Billed Hours	Total Compensation (\$)
April Iniguez	\$425	\$382.50	29.8	\$11,398.50
<b>Total Paralegals and Other Non-Legal Staff:</b>			#29.8	<b>\$11,398.50</b>

PROFESSIONALS	10% DISCOUNTED BLENDED RATE (\$)	TOTAL BILLED HOURS	TOTAL COMPENSATION (\$)
Partners and Counsel	\$1,257.75	99.7	\$125,397.68
Paralegals/Non-Legal Staff	\$382.50	29.8	\$11,398.50
Blended Attorney Rate	\$1257.75	99.7	\$125,397.68
<b>Total Fees Incurred</b>		#130.1	<b>\$136,796.18</b>

**Exhibit B**

**Compensation by Task Code**

**AGGREGATE TIME SUMMARY BY TASK CODE**  
**FOR THE PERIOD FROM JUNE 29, 2022 THROUGH JULY 31, 2022**

<b>Task Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees (\$)</b>
701	Case Administration	3.6	\$3,465.00
702	Asset Analysis and Recovery	121.5	\$116,293.05
705	Fee/Employment Applications		
706	Fee/Employment Objections		
707	Mediation		
708	Claims Administration and Objections		
710	Litigation		
711	Court Hearings	4.4	\$4,851.00
712	Cash Collateral/DIP Financing/Exit Financing		
713	Lease/Executory Contract Issues		
714	First Day Hearing Preparation		
715	Creditor Inquiries		
716	Corporate Governance and Board Matters		
	<b>TOTAL</b>	<b>#130.1</b>	<b>\$124,609.05</b>

**Exhibit C**

**Expense Summary**

**AGGREGATE ITEMIZED DISBURSEMENTS FOR THE PERIOD  
FROM JUNE 29, 2022 THROUGH JULY 31, 2022**

Expenses Category	Total Expenses (\$)
Court Costs & Litigation Expenses	
Information Retrieval Services	2,281.65
Reporting Services	
Overtime – Meals	
Duplicating and Word Processing	2,060.55
Taxi	
Business Expenses	241.23
Miscellaneous	
<b>TOTAL</b>	<b>\$4,583.43</b>

**Exhibit D**

**Itemized Time Detail**



Tax ID No. 94-1311126

Tim McChristian  
Executive Director  
Madison Square Boys & Girls Club  
250 Bradhurst Ave  
New York, NY 10039

July 27, 2022  
Invoice No. 8488848  
Client No. 055278  
Matter No. 0000002  
Michael Kosnitzky  
(786) 913-4900

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**For Professional Services Rendered and Disbursements Incurred through June 30, 2022**

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Matter Name	Services	Disbursements	Balance Due
Insurance Recovery	\$ 8,754.90	\$ 110.40	\$ 8,865.30
<b>Total This Invoice:</b>	<b>\$ 8,754.90</b>	<b>\$ 110.40</b>	<b>\$ 8,865.30</b>

*Current charges only. Time and disbursements not yet recorded will be included in future invoices.*

Client No: 055278  
Matter No: 0000002  
Michael Kosnitzky

July 27, 2022  
Invoice No. 8488848  
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## Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through June 30, 2022

### Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 702 - Asset Analysis and Recovery</u>				
B. L. Croutch	06/29/22	Review email from M. Plevin (.2); Conference with PW re: M. Plevin issues (.4); emails from/to A. Kornberg re: notice to historical insurers for BK filing (.2); revise Debtor application for Pillsbury as special insurance counsel (1.1); revise J. Dold and J. Jean supporting declarations (.6); emails re: A/R status for Application papers (.2); emails from/to S. Hasan re: documents for declarations (.2); email from A. Kornberg re: board decision (.1); emails with J. Jean and M. Kosnitzky re: status and next steps (.4); review FK June invoices for CVA matters for privilege (.4); prepare email to K. Mangino at Chubb for reimbursement of FK June invoices (.2); emails with J. Jean re: engagement and retainer issues (.5).	4.50	\$4,963.50
A. Iniguez	06/29/22	Emails regarding Friedman Kaplan invoices (.1); update Friedman Kaplan invoice chart (.3); update spreadsheet of all invoices (.2); update spreadsheet of grand totals of payments from Chubb and invoices from Friedman Kaplan and percentage of same (.3).	0.90	344.70
J. D. Jean	06/29/22	Emails and confer with B. Croutch re: scope of work and retention (.3); review and revise same (.3); emails with PW re: notice of BK to D&O (.2).	0.80	1,130.40

Client No: 055278  
Matter No: 0000002  
Michael KosnitzkyJuly 27, 2022  
Invoice No. 8488848  
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Crutch	06/30/22	Email from K. Mangino re: FK invoices and allocation percentages (.2); review documentation re: allocation percentages (.2); emails with B. Baker re: same (.4); emails re: BK filing and next steps (.6); emails with PWSP Team re: status update (.4); emails with J. Strauss and B. Baker re: Audit request (.3).	2.10	2,316.30
		<b>Subtotal Task: 702 - Asset Analysis and Recovery</b>	<b>8.30</b>	<b>\$8,754.90</b>
		<b>Total:</b>	<b>8.30</b>	<b>\$ 8,754.90</b>

**Time Summary By Task**

<u>Task</u>	<u>Hours</u>	<u>Amount</u>
702 - Asset Analysis and Recovery	8.30	8,754.90
<b>Total</b>	<b>8.30</b>	<b>\$ 8,754.90</b>

**Disbursements Incurred**

<u>Date</u>	<u>Type</u>	<u>Description</u>	<u>Amount</u>
06/30/22	Task E124 - Litigation Support (hosting charge)	Summary	\$110.40
<b>Total Disbursements:</b>			<b>\$110.40</b>

**Disbursement Summary**

<u>Type</u>	<u>Amount</u>
Litigation Support (hosting charge)	110.40
<b>Total:</b>	<b>\$110.40</b>

**Total Due For Matter 0000002: \$8,865.30**



Tax ID No. 94-1311126

Tim McChristian  
Executive Director  
Madison Square Boys & Girls Club  
250 Bradhurst Ave  
New York, NY 10039

July 27, 2022  
Invoice No. 8488848  
Client No. 055278  
Matter No. 0000002  
Michael Kosnitzky  
(786) 913-4900

## Remittance Advice

Enclose this Remittance Advice for Proper Credit

Matter Number	Services	Disbursements	Balance Due
0000002	\$ 8,754.90	\$ 110.40	\$ 8,865.30
<b>Total This Invoice:</b>	<b>\$ 8,754.90</b>	<b>\$ 110.40</b>	<b>\$ 8,865.30</b>

*Payable in U.S. Dollars upon receipt.*

### Payment Options:

**For payment by mail, remit to:** Pillsbury Winthrop Shaw Pittman LLP, P.O. Box 30769, New York, NY 10087-0769

**For Electronic Payments including Wire Transfer, ACH, and SWIFT Payments, send to:** JP Morgan Chase Bank NA, NY, NY; ABA# 021000021 (S.W.I.F.T. Code CHASUS33), for credit to Pillsbury Winthrop Shaw Pittman LLP, Account Number 301177087165.

Please include our client, matter and invoice number for proper credit.

[Additional remittance information may also be forwarded to [accountsreceivable@pillsburylaw.com](mailto:accountsreceivable@pillsburylaw.com)]



Tax ID No. 94-1311126

Tim McChristian  
Executive Director  
Madison Square Boys & Girls Club  
250 Bradhurst Ave  
New York, NY 10039

August 31, 2022  
Invoice No. 8488135  
Client No. 055278  
Matter No. 0000002  
Michael Kosnitzky  
(786) 913-4900

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**For Professional Services Rendered and Disbursements Incurred through July 31, 2022**

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Matter Name	Services	Disbursements	Balance Due
Insurance Recovery	\$ 117,135.80	\$ 4,473.03	\$ 121,608.83
<b>Total This Invoice:</b>	<b>\$ 117,135.80</b>	<b>\$ 4,473.03</b>	<b>\$ 121,608.83</b>

*Current charges only. Time and disbursements not yet recorded will be included in future invoices.*

Client No: 055278  
Matter No: 0000002  
Michael Kosnitzky

August 31, 2022  
Invoice No. 8488135  
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## Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through July 31, 2022

### Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 701 - Case Administration</u>				
B. L. Croutch	07/05/22	Prepare audit response per audit request letter (.3); emails with J. Jean and M. Kosnitzky with proposed response (.4); emails with B. Baker and J. Strauss re: status update (.4); email from J. Glasser of Lester Schwab law firm re: Public Service Insurance (.2); emails with A. Iniguez re: same (.4); review file re: Public Service Insurance (.6); review BK Court Orders and upcoming hearings (.2).	2.50	\$2,757.50
A. Iniguez	07/05/22	Email regarding prior correspondence to Jonathan Glasser for Public Service Ins. Co. (.1); review emails and NetDocs regarding same (.2).	0.30	114.90
B. L. Croutch	07/06/22	Emails from/to J. Strauss re: insurance correspondences.	0.40	441.20
A. Iniguez	07/07/22	Review letter from Kimberly Taylor, A.G. Risk Management Inc in response to January 28, 2022 Proof of Claim Submission (.1); update chart regarding same (.1).	0.20	76.60
A. Iniguez	07/08/22	Review letter from Kimberly Taylor, A.G. Risk Management Inc. re: January 28, 2022 Proof of Claim Submission; update chart regarding same.	0.20	76.60
<b>Subtotal Task: 701 - Case Administration</b>			<b>3.60</b>	<b>\$3,466.80</b>

Task: 702 - Asset Analysis and Recovery

Client No: 055278  
 Matter No: 0000002  
 Michael Kosnitzky

August 31, 2022  
 Invoice No. 8488135  
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Croutch	07/11/22	Review Rockefeller's opposition filing re: mediation (.2); review US Trustee's opposition papers to mediation at this time (.2); review Cravath's responses and objections to J. Marsh's insurance subpoena (.3); review Federal's responses to insurance subpoena and motion to quash and supporting papers (.5); emails with B. Baker and J. Strauss re: same (.4).	1.60	\$1,764.80
J. D. Jean	07/11/22	Conference with B. Croutch re: coverage issues re: Chubb and defense costs.	0.60	847.80
B. L. Croutch	07/12/22	Emails with B. Baker and J. Strauss re: status (.3); review letter from K. Mangino re: additional Chubb policies (.2); emails with J. Jean re: same (.2); cursory review newly found Chubb policies received from Chubb (.9); emails with M. Pierro re: same (.4); conference with M. Pierro re: Chubb policies (.4); emails to J. Strauss re: recent insurance correspondences (.2); review PW's reply to Oppositions to Mediation (.2); review letter from Allianz Resolution Management re: coverage position (.2); email and follow up calls with M. Pierro re: Security Mutual and underlying policies (.6).	3.60	3,970.80
A. Iniguez	07/12/22	Review correspondence from Chubb regarding their investigation of claims and enclosing 6 insurance policies issued by INA (.3); update correspondence chart with letter and all 6 insurance policies (.6); upload policies to shared drive and NetDocs (.2); review letter from Allianz Resolution for Jefferson Insurance acknowledging receipt of 6/6/22 correspondence (.1); update chart regarding same (.1).	1.30	497.90
B. L. Croutch	07/13/22	Attend motion for mediation (.9); review notice of appointment of creditors (.2); emails with B. Baker re: same (.3).	1.40	1,544.20
J. D. Jean	07/13/22	Review coverage correspondence from Chubb and confer with B. Croutch re: implications of same.	0.40	565.20

Client No: 055278  
Matter No: 0000002  
Michael KosnitzkyAugust 31, 2022  
Invoice No. 8488135  
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Croutch	07/14/22	Email from A. Kornberg re: upcoming Madison Board meeting and Pillsbury presentation (.2); emails with J. Jean re: same (.4); prepare Pillsbury insurance presentation re: Chubb/Federal policies and new policies produced (4.0); emails with J. Jean re: Chubb's motion to quash subpoena (.4).	5.00	5,515.00
B. L. Croutch	07/15/22	Work on insurance presentation (2.0); review US Trustee's Opposition Motion/Objections to Motion to Temporarily Suspend (.2).	2.20	2,426.60
B. L. Croutch	07/18/22	Prepare for upcoming Board meeting (1.1); prepare detailed chart of new Policies and information (4.1); multiple emails with J. Jean re: same (.6); review CVA plaintiffs for possible addition to Chubb and other insurance re-tenders given new policy information (.6); emails with M. Pierro re: insurance issues (.4); attend Board meeting (1.6).	8.40	9,265.20
A. Iniguez	07/18/22	Emails regarding what complaints or Plaintiffs alleged abuse was during 1968-1976 time (.2); reviewed Friedman Kaplan chart regarding same (.3); emails regarding chart of invoices from Friedman Kaplan for CVA matter (.2); updated chart of all Friedman Kaplan invoices for CVA, Alan Gray reports and Chubb payments 2019-2022 (2.8).	4.20	1,608.60
J. D. Jean	07/18/22	Review materials re: board meeting; review correspondence with Chubb re: newly located policies; confer with B. Croutch re: demands on primary insurers identified in Chubb policies and demand for defense/indeemnity against Chubb under newly located policies; prepare for board meeting; attend board meeting; confer with B. Croutch re: Chubb and National Union and defense costs.	3.90	5,510.70

Client No: 055278  
 Matter No: 0000002  
 Michael Kosnitzky

August 31, 2022  
 Invoice No. 8488135  
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Crutch	07/19/22	Review information from M. Pierro (.6); conference with FK and PW firms re: status (.6); work on new insurance policies' issues and revise charts (.8); email to K. Mangino re: additional Federal policy numbers identified to produce the policies (.2); work on issues regarding possible new re-tenders to Chubb (.7); work on issues re: possible new FK invoices from CVA matter to submit to Chubb in light of new policies/time periods (.8); emails with B. Baker re: same (.4).	4.10	4,522.30
A. Iniguez	07/19/22	Update chart of complains with abuse allegations between 1968-1976 (.4); email same to attorney for review (.2).	0.60	229.80
B. L. Crutch	07/21/22	Work on new insurance issues and cases to re-tender (4.3); review letter from Allianz re: Jefferson Insurance "newly" discovered policies and defense (.2); emails to client re: same (.2); emails to PW and FK re: same (.2); emails with J. Jean re: next steps (.4).	5.30	5,845.90
A. Iniguez	07/21/22	Update correspondence chart with Jefferson insurance agreeing to defense costs for M.H. v... Rockefeller University; Hector Bush, et al. v. Madison Square Boys & Girls Club, Inc. Case No. 950580 (Bush #2)- 15 Plaintiffs; Samuel Castrillo v. Madison, G.F. v. The Madison Square Boys and Girls Club and Hector Bush, et al. v. Madison - Case No. 951272 (Bush #3) - Robert Ramirez. (.3).	0.60	229.80
J. D. Jean	07/21/22	Review and respond to emails re defense costs; review coverage correspondence.	0.80	1,130.40

Client No: 055278  
 Matter No: 0000002  
 Michael Kosnitzky

August 31, 2022  
 Invoice No. 8488135  
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Crutch	07/22/22	Review letter from National Union/American Home to Mediator and emails re: same (.6); work on insurance charts (.7); email from K. Mangino re: insurance policies and information Chubb wants (.2); draft email to K. Mangino re: re-tenders of 20 plaintiffs/cases (.3); emails with J. Jean re: same (.2); emails with B. Baker re: '85-'86 Plaintiffs, '68-'70 plaintiffs, and '71-'76 Plaintiffs (.6); work on charts for each plaintiff and complaint re: same (4.3); emails from M. Pierro re: insurance issues (.4); follow up conference with M. Pierro re: same (.6).	7.70	8,493.10
A. Iniguez	07/22/22	Reviewed correspondence from Robert W. DiUbaldo representing National Union and American Home to Hon. Shelley C. Chapman regarding the 6 insurance policies recently provided by Chubb; (.2) update chart regarding same (.1); emails regarding Security Mutual and Puritan Insurance memos for tender letters to same (.2).	2.80	1,072.40
J. D. Jean	07/22/22	Confer with B. Crutch re: defense costs and coverage under Chubb and excess policies; review emails and correspondence.	0.80	1,130.40
B. L. Crutch	07/25/22	Emails with A. Kornberg and J. Jean re: National Union and Mediation (.4); Review complaints and prepare lengthy tender letters to Security Mutual for 38 additional plaintiffs and cases (9.2); multiple emails with A. Iniguez re: plaintiffs (.6); multiple emails with B. Baker re: same (.6); revise draft letter to Chubb re: re-tenders of certain plaintiffs (.2); review IAG's proposed revised charts (.4).	11.40	12,574.20

Client No: 055278  
 Matter No: 0000002  
 Michael Kosnitzky

August 31, 2022  
 Invoice No. 8488135  
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
A. Iniguez	07/25/22	Emails regarding complaints for tender letters to send to Puritan and Security Mutual (.2); review charts from Friedman Kaplan for abuse dates (.4); organize copies of complaints in shared drive folder for tender letters (.4); prepare charts of complaints for each insurer (.6); review and chart all complaints listed in draft of lender letter to Security Mutual (.7); chart same (.3); review complaints for additional complaints within 1980-1981 for Puritan tender letter (.7); update chart regarding same (.3).	3.60	1,378.80
B. L. Crutch	07/26/22	Conference with B. Baker and J. Strauss re: status (.8); review IAG's updated charts; conference with IAG and J. Strauss (.9); review complaints and work on tender letter to Puritan of 13 complaints and multiple plaintiffs (6.6); emails with B. Baker re: plaintiffs and alleged abuse dates, etc. (.6); prepare draft response to client re: new tenders and complaints/plaintiffs we anticipate with tender acceptances (.6).	9.50	10,478.50
A. Iniguez	07/26/22	Emails regarding information on Security Mutual and Arrowpoint Capital addresses and contacts for new tender letters (.2); review and update chart with information on same (.7); review complaints for descriptions on first draft of tender letter to Puritan (1.2); revise draft tender letter to Puritan with corrected paragraph references to complaints and additional complaints (2.3); emails regarding draft of tender letter to Security Mutual (.2); review complaints and amended complaints of listed 33 cases (1.9); revise Security Mutual draft tender letter with correct paragraph references and amended complaints (.9).	8.30	3,178.90

Client No: 055278  
 Matter No: 0000002  
 Michael Kosnitzky

August 31, 2022  
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Crutch	07/27/22	Work on tenders for Security Mutual insurance (3.2); work on tenders for Puritan Insurance (1.1); multiple emails with A. Iniguez re: information needed for relevant dates, specific plaintiffs and tenders (.9); research re: Security Mutual and successors-in-interest (.6); emails with J. Strauss and M. Pierro re: revised insurance charts (.3); conference with M. Pierro re: same (.4); multiple emails to/from B. Baker re: plaintiffs for new tenders and time periods of alleged abuses (.6); revise response to T. McChristian re: new insurance and tender issues (.2).	7.10	7,831.30
A. Iniguez	07/27/22	Review draft letter to Security Mutual insurers and revise last paragraph acknowledging receipt of listed complaints (.6); review latest draft updated by attorney and add highlighted changes from draft to attorney's copy (.8); review email and attachments from Friedman Kaplan regarding complaints to send to Security Mutual and Puritan (.2); review and compare charts with draft tender letters (.4); send information regarding same difference to attorney (.3); review draft of inserts to letters of additional complaints to add to tender letters (.3); update Safety Mutual tender letter with additional 5 complaints (.9); update Puritan tender letter with additional complaint (.6); review revised draft of insurance address and contact information chart (.2); emails regarding final drafts of tender letters (.3); emails regarding final tenders, enclosures and addressees (.4); prepare link of folders of complaints for Security Mutual letter for copy center to print (.3); prepare link of complaints of complaints for Puritan letter for copy center to print (.2).	5.90	2,259.70
J. D. Jean	07/27/22	Review strategy re: coverage and defense costs; analysis re: Chubb policies; analysis re: other insurers' responsibilities; confer with B. Crutch re: same.	1.70	2,402.10

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 Michael Kosnitzky

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Crutch	07/28/22	Multiple emails with J. Strauss and M. Pierro re: insurance issues for the Mediation Statement (0.4); work on finalizing tender letters to Puritan Insurance (.9); work on finalizing tender letters to Security Mutual (1.1); finalize and send letter to K. Mangino re: renewal of earlier tenders in light of Federal policies now produced (.4); review latest draft mediation statement and provide comments/information (.4); review calculations re: insurance coverages (.5); review IAG comments to latest draft Mediation Statement (.2); multiple emails re: same (.4); multiple emails to J. Strauss re: fees/costs issues for Mediation Statement (.4).	4.60	5,073.80
A. Iniguez	07/28/22	Update correspondence chart with information on tender letter to Puritan of 14 complaints (.2); update chart with tender letter to Chubb of 20 complaints (.2); update chart with tender letters to Arrowpoint, Empire, Security the Bund International in China, Sirus Group, and Sam Ravit re tender of 38 complaints. (.4).	0.90	344.70
J. D. Jean	07/28/22	Review analysis and coverage correspondence; emails with PW re: same.	0.80	1,130.40
B. L. Crutch	07/29/22	Email from J. Dold re: D&O issues (.2); prepare "recent Developments" notice draft for client (.3); emails with P. Gillon and J. Vazquez re: same (.4); emails with M. Pierro re: Security Mutual successors-in-interest (.4); emails from/to L. Varga re: fees/costs and reimbursement from Chubb for Mediation Statement (.4); emails with J. Jean re: status (.4); review latest draft Mediation Statement (.3); email from A. Schwartz (US Trustee) re: Pillsbury retention and application (.2); review comments from US Trustee to Pillsbury's Application to US Bankruptcy Court to employ Pillsbury as special insurance counsel (.3); multiple emails with J. Jean re: same (.4).	3.30	3,639.90

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
J. D. Jean	07/29/22	Confer re: Chubb and excess policies; confer re: mediation statement and positions re: same and coverage.	1.20	1,695.60
J. N. Vazquez	07/29/22	Review and edit draft of email to be sent to carriers re bankruptcy.	0.60	394.20
J. N. Vazquez	07/29/22	Review Argo policy to determine if there are additional notice requirements for filing of bankruptcy.	0.40	262.80

**Subtotal Task: 702 - Asset Analysis and Recovery      114.60      \$108,815.80**

Task: 711 - Court Hearings

B. L. Croutch	07/01/22	Attend 1st Day Hearing before Judge S. Lane in U.S. Bankruptcy Court (2.0); prepare status update memorandum re: same (.6).	2.60	\$2,867.80
B. L. Croutch	07/20/22	Attend BK hearing (1.4); emails with B. Baker re: plaintiffs and alleged time periods to work on new tender letters (.4).	1.80	1,985.40

**Subtotal Task: 711 - Court Hearings      4.40      \$4,853.20**

**Total:      122.60      \$ 117,135.80**

**Time Summary By Task**

<u>Task</u>	<u>Hours</u>	<u>Amount</u>
701 - Case Administration	3.60	3,466.80
702 - Asset Analysis and Recovery	114.60	108,815.80
711 - Court Hearings	4.40	4,853.20
<b>Total</b>	<b>122.60</b>	<b>\$ 117,135.80</b>

**Disbursements Incurred**

<u>Date</u>	<u>Type</u>	<u>Description</u>	<u>Amount</u>
06/28/22	Computer Research	Summary	\$2,281.65
07/31/22	Litigation Support (hosting charge)	Summary	111.40
07/28/22	Reproductions	Summary	2,060.55

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06/30/22	Court Services	Vendor: CourtAlert.Com, Inc. Invoice#: 182970-2206 Date: 6/30/2022 - CourtAlert June 2022, S. Mercadante	19.43	
			<b>Total Disbursements:</b>	<b>\$4,473.03</b>

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### Disbursement Summary

Type	Amount
Computer Research	2,281.65
Court Services	19.43
Litigation Support (hosting charge)	111.40
Reproductions	2,060.55
<b>Total:</b>	<b>\$4,473.03</b>

**Total Due For Matter 0000002:**      **\$121,608.83**



Tax ID No. 94-1311126

Tim McChristian  
Executive Director  
Madison Square Boys & Girls Club  
250 Bradhurst Ave  
New York, NY 10039

August 31, 2022  
Invoice No. 8488135  
Client No. 055278  
Matter No. 0000002  
Michael Kosnitzky  
(786) 913-4900

## Remittance Advice

Enclose this Remittance Advice for Proper Credit

Matter Number	Services	Disbursements	Balance Due
0000002	\$ 117,135.80	\$ 4,473.03	\$ 121,608.83
<b>Total This Invoice:</b>	<b>\$ 117,135.80</b>	<b>\$ 4,473.03</b>	<b>\$ 121,608.83</b>

*Payable in U.S. Dollars upon receipt.*

### Payment Options:

**For payment by mail, remit to:** Pillsbury Winthrop Shaw Pittman LLP, P.O. Box 30769, New York, NY 10087-0769

**For Electronic Payments including Wire Transfer, ACH, and SWIFT Payments, send to:** JP Morgan Chase Bank NA, NY, NY; ABA# 021000021 (S.W.I.F.T. Code CHASUS33), for credit to Pillsbury Winthrop Shaw Pittman LLP, Account Number 301177087165.

Please include our client, matter and invoice number for proper credit.

[Additional remittance information may also be forwarded to [accountsreceivable@pillsburylaw.com](mailto:accountsreceivable@pillsburylaw.com)]